## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:	)	Chapter 9
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
Debtor.	) )	

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned hereby enters her appearance in the above-captioned bankruptcy case as counsel to the Police and Fire Retirement System of the City of Detroit (the "PFRS").

FURTHER, PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9007 of the Federal Rules of Bankruptcy Procedure, the undersigned requests that all notices and all other papers required to be served in this case be served upon the following person and that the following person be added to the mailing matrix in this case:

Shannon L. Deeby CLARK HILL PLC 151 South Old Woodward Avenue Suite 200 Birmingham, Michigan 48009 Telephone: (248) 988-5889 sdeeby@clarkhill.com

FURTHER, PLEASE TAKE NOTICE that the foregoing request includes not only the notices and papers referred to in the above-referenced Bankruptcy Rules but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal that is filed or made with regard to the above-referenced case and any proceedings therein.

This Notice of Appearance and Request for Service of Papers is without prejudice to the PFRS' rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the Court, and shall not be deemed or construed as a submission of the PFRS to the jurisdiction of the Court.

Without limiting the foregoing, this Notice of Appearance and Request for Service of Papers is without prejudice to the PFRS' rights to object to the eligibility and/or propriety of the City of Detroit, Michigan to be a debtor under chapter 9 of title 11 of the United States Code, 11 U.S.C. §101 *et seq.*, and to bring those matters in any appropriate forum, and shall not be deemed or construed as a waiver of these rights.

Neither this Notice of Appearance, nor any subsequent appearance, pleading, claim or suit, is intended to waive (a) the PFRS' right to have final orders in non-core matters entered only after *de novo* review by a federal district court judge; (b) the PFRS' right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (c) the PFRS' right to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretional withdrawal; (d) any other rights, claims, actions, or defenses to which the PFRS is or may be entitled in law or in equity, all of which rights, claims, actions, and defenses are expressly reserved.

## CLARK HILL PLC

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Counsel to the Police and Fire Retirement System of the City of Detroit

Dated: July 22, 2013